



HUGHES HUBBARD & REED LLP
Christopher Paparella
John Fellas
Hagit Elul
One Battery Park Plaza
New York, New York 10004
(212) 837-6000
paparella@hugheshubbard.com

Attorneys for Defendants Technip Italy S.p.A. and Technip S.A.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HOVENSA L.L.C.,

Plaintiff,

-vs-

TECHNIP ITALY S.P.A and
TECHNIP S.A.,

Defendants.

Case No.: 08 CIV. 1221

**DECLARATION OF
PATRICK PICARD**

Patrick Picard declares under penalty of perjury as follows:

1. I am the Corporate Secretary of Technip S.A, a French corporation that has its principal place of business at 6/8 Allée de l'Arche, 92400 Courbevoie, France. I submit this declaration on behalf of Defendant Technip S.A. in order to put certain facts and circumstances before the Court. I have personal knowledge of the facts and circumstances contained in this declaration except where I state my knowledge to be on information and belief, in which case I believe such statements to be true.

2. Technip S.A. does not do or solicit business in New York. Among other things, Technip S.A.:

- does not maintain any office in New York;

Technip

- does not have any employees or agents resident in New York;
- does not have a New York telephone number;
- does not have a New York bank account;
- does not own, rent or lease any real property in New York;
- does not maintain any other property in New York;
- is not registered to do business in New York;
- does not pay any taxes in New York; and
- does not have an agent for service of process in New York.

3. Based on my review of the relevant records and discussions with the relevant

Technip S.A. personnel, Technip S.A. did not sign the "Parent Guaranty Agreement" annexed as Appendix Q to the Construction Agreement and referred to in paragraphs 41-45 of the Complaint in this case.

I declare under penalty of perjury that the foregoing is true and correct.

April 17, 2008
Paris, France



Patrick Picard
Corporate Secretary

CERTIFICATE OF SERVICE

I, William J. Sanchez, am over the age of eighteen (18) years, not a party to this action, so caused a true and correct copy of the foregoing Notice of Motion, dated April 18, 2008, Defendant's Memorandum of Law in Support of Their Motion to Dismiss dated April 18, 2008, Declaration of Patrick Picard, dated April 17, 2008, Declaration of Etienne Gory, dated April 17, 2008, the Declaration of Christopher Paparella, dated April 17, 2008, and Defendant's Corporate Disclosure Statement to be served on this 18th day of April, 2008, to the following:

VIA ELECTRONIC FILING & FEDEX:

Gabriel Del Virginia
Law Offices of Gabriel Del Virginia
641 Lexington Avenue, 21st floor
New York, NY 10022

VIA E-MAIL:

George T. Shipley
Jonathan Smith
Shipley Snell Montgomery LLP
4600 First City Tower
1001 Fannin
Houston, TX 77002

ATTORNEYS FOR PLAINTIFF HOVENSA

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 18, 2008
New York, New York

/s/ William J. Sanchez
William J. Sanchez